

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

**ELIZABETH PETERSON,  
AMANDA CARLTON,  
REBECCA HIRSCH, MICHELE  
O'DELL, and PRASANNA  
RAMAKRISHNAN**, individually and  
on behalf of all others similarly  
situated,

Plaintiffs,

v.

**BSH HOME APPLIANCES  
CORPORATION d/b/a BOSCH,**

Defendant.

Case No. 2:23-cv-00543-RAJ

**JOINT SETTLEMENT STATUS REPORT**

Pursuant to this Court's MINUTE ORDER, dated August 2, 2023, the Parties submit this Settlement Status Report and show the Court as follows.

In their previous Joint Settlement Status Report to the Court (Dkt. No. 14), the Parties outlined the history of settlement discussions and the critical terms of the Settlement Agreement to which the Parties had already negotiated. At that point, the Parties had already exchanged several rounds of the draft Settlement Agreement, negotiating several components including what will be required for proof of purchase, funding of the Settlement Fund, and other details necessary to finalize the agreement. All materials terms have been agreed to.

Since the last Joint Settlement Status Report, the Parties have worked diligently to finalize the remaining details of the Settlement Agreement. The Parties have exchanged additional drafts of the Settlement Agreement and have met and conferred over resolving the last outstanding issues

that remain between the Parties, including a lengthy conference on September 21, 2023, to reach a final agreement on certain language (e.g. claims period definitions, administration of the extended service period, etc.). The Parties believe that they have reached an agreement on these last remaining issues, and that all that remains is administrative proofing and finalization of exhibits.

Although the Parties had anticipated the filing of the Motion for Preliminary Approval by today's date, there are just a few outstanding items in the Settlement Agreement that the Parties believe are resolved and upon finalizing exhibits, can be signed. Accordingly, the Parties anticipate that the Motion for Preliminary Approval can be filed by October 20, 2023.

DATED: September 22, 2023

**MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN PLLC**

By: /s/ Harper T. Segui

Harper T. Segui\*  
825 Lowcountry Blvd., Suite 101  
Mount Pleasant, SC 29464  
T: 919-600-5000  
[hsegui@milberg.com](mailto:hsegui@milberg.com)

Andrew A. Lemmon (#53034)  
16212 Reitan Road NE  
Bainbridge Island, WA 98110  
T: 985-783-6789  
[alemmon@milberg.com](mailto:alemmon@milberg.com)

Rachel Soffin\*  
800 S. Gay Street, Suite 1100  
Knoxville, TN 37929  
T: 865-247-0080  
F: 865-522-0049  
[rsoffin@milberg.com](mailto:rsoffin@milberg.com)

Erin Ruben\*\*  
900 W. Morgan St.  
Raleigh, NC 27603  
T: 865-247-0080  
F: 865-522-0049  
[eruben@milberg.com](mailto:eruben@milberg.com)

Thomas A. Pacheco\*  
900 W. Morgan St.  
Raleigh, NC 27603  
T: 212-946-9305  
F: 865-522-0049  
[tpacheco@milberg.com](mailto:tpacheco@milberg.com)

\*Admitted *pro hac vice*

\*\*Motion to be admitted *pro hac vice*  
forthcoming  
*Attorneys for Plaintiffs*

DATED: September 22, 2023

**PERKINS COIE LLP**

/s/ Christopher M. Ledford

Christopher M. Ledford  
1201 Third Avenue, Suite 4900  
Seattle, Washington 98101-3099  
CLedford@perkinscoie.com

M. Ray Hartman III \*  
11452 El Camino Real, Suite 300  
San Diego, CA 92130-2080  
RHartman@perkinscoie.com

Jasmine W. Wetherell \*  
1888 Century Park E., Suite 1700  
Los Angeles, CA 90067-1721  
JWetherell@perkinscoie.com

\*Motion to be admitted *pro hac vice*  
forthcoming

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 22, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rule of Civil Procedure.

By: /s/ Harper T. Segui  
Harper T. Segui\*  
**Milberg Coleman Bryson**  
**Phillips Grossman LLC**  
825 Lowcountry Blvd., Suite 101  
Mount Pleasant, SC 29464  
T: 919-600-5000  
[hsegui@milberg.com](mailto:hsegui@milberg.com)